

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**ADAM COMMUNITY CENTER**, a  
domestic nonprofit corporation, a/k/a  
**ADAM COMMUNITY (ACC)**, a  
Domestic nonprofit corporation,

Plaintiff,

**Case No: 18-13481**

**Hon. Nancy G. Edmunds**

v.

**CITY OF TROY**, et. al.

Defendants.

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**PLAINTIFF’S EX-PARTE MOTION TO EXCEED PAGE LIMIT**

Plaintiff moves ex parte pursuant to E.D. Mich. LR 7.1(d)(3) to exceed the page limit by 5 pages in his motion for summary judgment, filed concurrently. Plaintiff’s Motion seeks Summary Judgement on two of its eleven counts. However, the Claims giving rise to this motion involve detailed and nuanced explanation of fact and municipal ordinance and law. The litigation itself encompassed this suit and a companion suit filed by the United States Department of Justice, took over two years to reach this point, involved thirteen (13) depositions, some very lengthy, as well as thousands of pages of documents produced as evidence by all parties.

Accordingly, in order to present all relevant facts and law necessary to fairly represent the issues involved in this case, a five (5) page extension is necessary.

Accordingly, Plaintiff respectfully requests the Court grant Defendant's ex parte motion to exceed page limits by 5 pages in his motion for summary judgment, filed concurrently. A proposed order was submitted via ECF.

Respectfully Submitted,

**CAIR-MI LEGAL FUND**

/s/ Amy V. Doukoure  
BY: Amy V. Doukoure (P80461)  
30201 Orchard Lake Road, Suite 260  
Farmington Hills, MI 48334  
(248) 559-2247  
adoukoure@cair.com

**COUNSEL FOR PLAINTIFF**

DATED: December 23, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on December 23,2020, the foregoing paper was filed with the Clerk of the Court using the ECF System which will give notice to all counsel of record.

/s/ Amy V. Doukoure